

# SANDLER REIFF

SANDLER REIFF LAMB  
ROSENSTEIN & BIRKENSTOCK, P.C.

1025 Vermont Ave NW, Suite 300  
Washington, DC 20005  
www.sandlerreiff.com  
T: 202-479-1111  
F: 202-479-1115

June 23, 2016

Via E-Mail

Jeff S. Jordan, Esq.  
Supervisory Attorney  
Federal Election Commission  
999 E Street, N.W.  
Washington D.C. 20463

Re: MUR 7079

Dear Mr. Jordan:

I serve as counsel for Koti Sangisetty, Aruna Sangisetty and Ravi Sangisetty. By way of background, Ravi Sangisetty was a candidate for the United States House of Representatives from the 3<sup>rd</sup> District of Louisiana in 2010. Mr. Sangisetty had an authorized committee Sangisetty for Congress, LLC. The authorized committee was terminated with the Commission in February of 2011. Koti and Aruna Sangisetty are the parents of Ravi Sangisetty. Koti Sangisetty died in 2013. Aruna Sangisetty is a resident of Houma, Louisiana. Designations of Counsel are attached for all three respondents.


I write to respond to a complaint filed by the Foundation for Accountability and Civic Trust. The complaint appears to focus on the fundraising activities of Kanta Bera, the father of Congressman Ami Bera. Although the complaint does not specifically allege any illegal acts by any of my clients, Mr. and Mrs. Sangisetty both made contributions to Ami Bera for Congress in March of 2010. In addition, the Sangisetty campaign disclosed the receipt of contributions from Mr. Bera and other members of the Bera family. However, the complaint does not properly allege and Respondents deny that any contribution in the name of another has occurred. First, Mr. and Mrs. Sangisetty made contributions to the Bera campaign from their own personal funds and were not reimbursed by any third party for their contributions. Even assuming, *arguendo*, that such a contribution may have been solicited by Mr. Bera, and Mr. Bera promised to solicit members of his family for contributions to Ravi Sangisetty's congressional campaign does not

meet the elements required to find that a contribution was made in the name of another. For a contribution to be made in the name of another, funds must be provided to a "straw donor" for the purpose of making a contribution. See 52 U.S.C. § 30122; 11 C.F.R. § 110.4(b)(2); FEC Matters Under Review 6143; 4879; 4876; 4871; 4796. No contributions made by Mr. and Mrs. Sangisetty were reimbursed by a third party, and no such allegation was made in the complaint. Therefore, Mr. and Mrs. Sangisetty did not violate 52 U.S.C. § 30122.

In addition, although Sangisetty for Congress did receive contributions from the family of Ami Bera, it is not aware, and were not aware at the time of receipt, of any specific facts that would lead to the conclusion that such contributions violated federal law or were otherwise reimbursed by a third party. To be sure, it is not a violation of federal campaign finance laws for the supporters of two campaigns to agree to contribute to the campaign of the other. Absent evidence of any reimbursement for such contributions, the attempt to regulate such conduct would be highly dubious under the First Amendment of the United States Constitution.

Notwithstanding the above (including the fact that Koti Sangisetty is deceased and Ravi Sangisetty's campaign committee terminated all operations over five years ago), all of allegations that relate to the respondents occurred over six years ago. Therefore, the allegations related to respondents must be dismissed in accordance with 28 U.S.C. § 2462 because they are time barred by the statute of limitations. Therefore, we respectfully request that the Commission dismiss this matter with respect to the above reference respondents.

Respectfully submitted,



Neil Reiff  
Counsel for Koti Sangisetty, Aruna  
Sangisetty and Ravi Sangisetty

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FEDERAL ELECTION COMMISSION  
999 E Street, NW  
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL  
Please use one form for each Respondent/Entity/Treasurer  
FAX (202) 219-3923

MUR # 7079

NAME OF COUNSEL: Nail Riiff

FIRM: Sandler Riiff Land Rosestein & Linkerbach PC

ADDRESS: 1025 Vermont Ave NW, Suite 300  
Washington DC 20005

TELEPHONE- OFFICE (202) 479-1111

FAX (202) 479-1115 Web Address sandlerriiff.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6-23-16  
Date [Signature] Respondent/Agent -Signature Title (Treasurer/Candidate/Owner)

RESPONDENT: Kati Sanger-Hy  
(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: 935 Graven A. Suite 835  
(Please Print) New Orleans LA 70112

TELEPHONE (H) 504 462-1616 (W) \_\_\_\_\_

E-Mail: rlr@SangerHyLaw.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation



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999 E Street, NW  
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL  
Please use one form for each Respondent/Entity/Treasurer  
FAX (202) 219-3923

MUR # 7079

NAME OF COUNSEL: Neil Reiff

FIRM: Sandler Reiff (and) Rosenbaum & Binkenshock

ADDRESS: 1025 Vermont Ave NW Suite 300

Washington DC 20005

TELEPHONE- OFFICE (202) 479-1111

FAX (202) 479-1115 Web Address SandlerReiff.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6-23-11  
Date

[Signature]  
Respondent/Agent -Signature

Power of Attorney  
Title (Treasurer/Candidate/Owner)

RESPONDENT: Aruna Srinivasan  
(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: 935 Graven St. Suite 835  
(Please Print)

New Orleans LA 70112

TELEPHONE (H) 504 662-1016 (W) \_\_\_\_\_

E-Mail: nr@sandriereiff.com

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17044416617



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999 E Street, NW  
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL  
Please use one form for each Respondent/Entity/Treasurer  
FAX (202) 219-3923

MUR # 7079

NAME OF COUNSEL: Neil Reiff

FIRM: Sandler Reiff Law Associates / P.A.

ADDRESS: 1025 Vermont Ave. NW

Washington DC 20005

TELEPHONE- OFFICE (202) 479-1111

FAX (202) 479-1115 Web Address sandlerreiff.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6-23-16

Date

[Signature]  
Respondent/Agent -Signature

Self  
Title (Treasurer/Candidate/Owner)

RESPONDENT:

Ravi Sanyal  
(Committee Name, Company-Name, or Individual Named in Notification Letter)

MAILING ADDRESS: 975 Gravier St. Suite 835  
(Please Print)

New Orleans LA 70112

TELEPHONE (H) 504 662-1416 (W) \_\_\_\_\_

E-Mail: rsanyal@sanyalreiff.com

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